

Exhibit B

Azima, et al. v. Dechert LLP, et al.: Complaint Exhibit B
Selected Violations of 18 U.S.C. §§ 1341, 1343 (Mail and Wire Fraud)

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
1.	Co-conspirator Buchanan (U.K.)	Defendant Handjani (U.S.)	4/4/2015	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Buchanan and Defendant Handjani discussed how to “target” Azima, making clear that such discussions also involved Defendants Gerrard and Frank. The RICO Conspirators noted that “another channel” was also being used to target the former CEO of Defendant Dechert’s Client. The RICO Conspirators agreed that they should “hook up and coordinate our attack.”
2.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	On or around 6/17/2015	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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3.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	On or around 7/8/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
4.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/17/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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5.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/25/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
6.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/26/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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7.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	9/3/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
8.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	9/24/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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9.	RICO Conspirators (Upon information and belief, India or Israel)	Afsaneh Azadeh (U.S.)	10/12/2015	Email	Hacking in furtherance of scheme to defraud Azima.	Hackers employed by the Enterprise sent a phishing email to an Azima employee. The email contained what looked like a link to a Huffington Post article, however the link did not lead to the Huffington Post, but directed to deferrer.website, where Enterprise hackers could obtain any confidential information entered by the recipient.
10.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/13/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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11.	RICO Conspirators (Upon information and belief, India or Israel)	Azima (U.S.)	10/14/2015	Email	Hacking in furtherance of scheme to defraud Azima.	Hackers employed by the Enterprise sent a phishing email to Azima falsely purporting to be from YouTube and including a link to a video about an aircraft. Instead of directing to YouTube, the link directs to deferrer.website, where Enterprise hackers could obtain any confidential information entered by the recipient.
12.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/15/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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14.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/21/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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15.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/5/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
16.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/19/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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18.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/25/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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19.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/30/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
20.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/3/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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21.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/7/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
22.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/16/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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24.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/18/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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25.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/21/2015	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
26.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/4/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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27.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/12/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
28.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/26/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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29.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/29/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
30.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	2/23/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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31.	Co-conspirator Page (U.K.)	Defendant Forlit (Israel)	On or around 3/1/2016	Email	Communications between co- conspirators and hacking and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Page sent Defendant Forlit a false engagement letter concealing hacking activities to facilitate bank payments and money laundering.
32.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	3/10/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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33.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	3/14/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
34.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	3/28/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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35.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	4/5/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
36.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	4/20/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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37.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/9/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
38.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/25/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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39.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/13/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
40.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/14/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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41.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	7/1/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
42.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	7/6/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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43.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/1/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
44.	Co-conspirator Buchanan (U.K.)	Defendant Frank (U.S.); Defendant Handjani (U.S.)	8/15/2016	Email	Manufacture of false evidence in furtherance of scheme to defraud Azima.	Co-conspirator Buchanan wrote an email to Defendants Frank and Handjani where Buchanan falsely stated he was informed by co-conspirator Page “last night that there is an internet site that is carrying a huge amount of material relating to FA.”

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45.	Defendant Gerrard (U.K.)	Defendant Del Rosso (U.S.)	8/16/2016	Email	Manufacture of false evidence in furtherance of scheme to defraud Azima.	Defendant Gerrard wrote an email to Defendant Del Rosso to create a false email trail suggesting that he asked Defendant Del Rosso to search for Azima's material on the Dark Web, which led to the discovery of Azima's hacked data online.
46.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/26/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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47.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/31/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
48.	Defendant Hughes (U.K.)	Azima (U.S.)	9/23/2016	Email	Dissemination of hacked data and threat of sham litigation in furtherance of scheme to defraud Azima.	Defendant Hughes sent Azima's U.S. counsel a demand letter with hacked Azima documents via email from Defendant Dechert's servers. The letter threatened Azima with litigation if he did not pay more than \$4.1 million, and falsely claimed that Hughes had innocently obtained the hacked documents from publicly available sources on the internet.

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49.	Defendant Hughes (U.K.)	Azima (U.S.)	9/29/2016	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Hughes falsely stated to Azima's U.S. counsel that Azima's hacked documents were found on the internet, stating that the "[d]ocuments were obtained from a number of sites," and listed three Dark Web torrent links.
50.	Defendant Dechert (U.S.)	Azima (U.S.)	10/7/2016	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's General Counsel Arthur Newbold sent an email to Azima's U.S. counsel, which copied Defendants Gerrard and Hughes, and stated, "I have been assured that neither Dechert nor our client knows whether your client's computer was hacked or by whom. I have also been told that Dechert is unaware of any communications between your client and his counsel."

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51.	Defendant Hughes (U.K.)	Azima (U.S.)	10/7/2016	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Hughes emailed Azima's U.S. counsel to falsely deny any involvement in hacking Azima and falsely claim that Dechert's Client had found Azima's hacked documents in the public domain.
52.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/10/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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53.	Defendant Dechert (U.S.)	Azima (U.S.)	10/20/2016	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein falsely claimed Azima's documents had only been found by Defendant Dechert after being made publicly available on the internet.
54.	Co-conspirator Buchanan (U.K.)	Co-conspirator Page (U.K.)	11/10/2016	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Buchanan emailed a public relations agent and copied co-conspirator Page to discuss media campaign to smear Azima's reputation and asked the PR agent to send Page a copy of RAKIA's claim against Azima in the U.K. Proceedings based on Azima's hacked documents.

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55.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/2/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
56.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/11/2016	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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57.	Defendant Dechert (U.S.)	U.S. District Court for the District of Columbia	12/12/2016	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	In a motion to dismiss Azima's D.C. District Court hacking lawsuit, Defendant Dechert falsely wrote that "The Letter Before Action [from Hughes] attached the [hacked] documents . . . and noted that they had been 'obtained . . . via publically [sic] available internet sources.'"
58.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/13/2016	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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60.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/12/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

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61.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/16/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
62.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/17/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
63.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	3/26/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
64.	Defendant Dechert (U.S.)	Azima (U.S.)	4/3/2017	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein falsely claimed to Azima's U.S. counsel that Azima's hacked documents had been "downloaded [by Dechert] from publicly accessible sites on the Internet," that there was no need for a protective order to prevent further dissemination, and that they had already been widely disseminated by others.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
65.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	4/25/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
66.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/3/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
67.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/18/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
68.	Defendant Dechert (U.S.)	U.S. District Court for the District of Columbia	6/13/2017	Electronic Case Filing and Service	Promotion of false story that settlement agreement was not devised to entrap Azima in sham litigation in furtherance of scheme to defraud Azima.	In a motion to dismiss Azima's D.C. District Court hacking lawsuit, Defendant Dechert falsely claimed that Dechert's Client "would not have paid Azima \$2.6 million in March 2016 in reliance on a warranty of good faith" if they had been able to hack Azima's emails prior to the settlement. But RICO Conspirators planned for the settlement to entrap Azima in sham litigation and were monitoring Azima's reactions to the settlement agreement in real-time through hacking.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
69.	Defendant Dechert (U.S.); Co-conspirator Buchanan (U.K.)	U.S. District Court for the District of Columbia	6/13/2017	Electronic Case Filing and Service	Promotion of false story that settlement agreement was not devised to entrap Azima in sham litigation in furtherance of scheme to defraud Azima.	Defendant Dechert and co-conspirator Buchanan filed an affidavit, in which Buchanan falsely claimed that Azima's allegations were "completely untrue." Buchanan also falsely claimed that "[i]f [Dechert's Client] had been able to read and monitor Mr. Azima's communications beginning back in October 2015 . . . we . . . would have never paid Mr. Azima \$2.6 million in connection with the March 2016 settlement agreement." But RICO Conspirators planned for the settlement to entrap Azima in sham litigation and were monitoring Azima's reactions to the settlement agreement in real-time through hacking.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
70.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/19/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
71.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/20/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
72.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/22/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
73.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/27/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
74.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	7/31/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
75.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/27/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
76.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/29/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
77.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	9/5/2017	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
78.	Defendant Dechert (U.S.)	Azima (U.S.)	9/12/2017	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein sent an email to Azima's U.S. counsel disputing that an agent of Dechert or Dechert's Client was involved in hacking Azima.
79.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/16/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
80.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/23/2017	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
81.	Co-conspirator Buchanan (U.K.)	Co-conspirator Page (U.K.)	On or around 2/18/2018	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Buchanan sent co-conspirator Page an invite to a meeting at the RAK Palace with co-conspirator Ruler to discuss progress of scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
82.	Defendant Dechert (U.S.)	Azima (U.S.)	4/3/2018	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein falsely told Azima's counsel that Dechert would not be returning Azima's stolen documents because, "We are aware of no basis on which we, or our client, could be required to 'return' to you documents that were downloaded from publicly accessible sites on the Internet."
83.	Defendant Dechert (U.S.)	U.S. District Court for the District of Columbia	7/13/2018	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein filed a witness statement, falsely claiming "law enforcement agencies" had "expressed interest in receiving Mr. Azima's data from RAKIA," while failing to reveal that it was at Dechert's instigation that law enforcement was interested in Azima in the first place.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
84.	Defendant Dechert (U.S.)	High Court of Justice, Business and Property Courts of England and Wales	7/13/2018	Sent Electronically or By Mail	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein transmitted over U.S. and U.K. wires a witness statement in the U.K. proceedings adopting false statements by Defendant Hughes in his July 13, 2018, witness statement that Azima's hacked data was discovered on "publicly available links" that were found by a "public relations company."
85.	Defendant Dechert (U.S.); Defendant Gerrard (U.K.); Defendant Hughes (U.K.)	Azima (U.S.)	8/3/2018	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein, Defendant Gerrard, and Defendant Hughes falsely stated to Azima's U.S. counsel that no Dechert attorney, employee or agent (including Gerrard and Hughes), had "been complicit in, or had knowledge of any of" the hacking of Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
86.	Defendant Dechert (U.S.)	U.S. District Court for the District of Columbia	8/7/2018	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein filed a U.K. decision fraudulent procured by and citing false statements from Defendant Hughes that Azima's stolen documents were discovered on "publicly available links" that were found by a "public relations company."
87.	Defendant Dechert (U.S.)	U.S. Court of Appeals for the D.C. Circuit	8/8/2018	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein, falsely claimed after July 2016, "one of the consultants [Dechert's Client] had instructed to monitor the Internet . . . identified . . . Azima's documents that were available for download."

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
88.	Defendant Dechert (U.S.)	U.S. Court of Appeals for the D.C. Circuit	8/18/2018	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein falsely stated that Dechert had found Azima's documents through a publicly available website.
89.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/16/2018	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$250,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
90.	Defendant Hughes (U.K.)	Co-conspirator Page (U.K.)	10/23/2018	Email	Communications between co-conspirators and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Hughes messaged co-conspirator Page to discuss an exchange of documents in advance of a Cyprus meeting to develop the false story on how the Enterprise obtained Azima's documents to conceal Enterprise's hacking of Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
91.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/6/2018	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$270,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
92.	Defendant Dechert (U.S.)	Defendant Gerrard (Cyprus); Defendant Hughes (Cyprus); Defendant Forlit (Cyprus); Co-conspirator Page (Cyprus); Co-conspirator Halabi (Cyprus)	11/21/2018	Phone call or video conference	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein remotely attended a meeting of co-conspirators in Cyprus meeting to develop the false story on how the Enterprise obtained Azima's documents to conceal Enterprise's hacking of Azima.
93.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	11/28/2018	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
94.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	11/28/2018	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
95.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	11/28/2018	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
96.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	11/28/2018	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
97.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	12/7/2018	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
98.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/7/2018	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$290,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
99.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/3/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
100.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/3/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
101.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/3/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
102.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/8/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
103.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/10/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
104.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/10/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
105.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/11/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
106.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/15/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
107.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/15/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
108.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/16/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
109.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/17/2019	Phone call	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
110.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/18/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
111.	Co-conspirator Page (U.K.)	Co-conspirator Arusy (U.S.)	1/23/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called co-conspirator Arusy to discuss the scheme to defraud Azima.
112.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	1/24/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
113.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/25/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$260,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
114.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	3/27/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
115.	Defendant Gerrard (U.K.); Defendant Del Rosso (U.S.); Co-conspirator Grayson (U.K.)	Azima (U.S. and U.K.); U.S. District Court for the District of Columbia; U.S. Court of Appeals for the D.C. Circuit; Defendant Dechert (U.S.); Defendant Gerrard (U.K.); Defendant Hughes (U.K.); U.K. High Court of Justice (U.K.); Jeff Horwitz (U.S.); Jon Gambrell (U.K.); Jack Gillum (U.S.); Paul Peachey (UAE); Zach Dorfman (U.S.)	4/2/2019	U.S. Mail	Dissemination of hacked data and promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendants Gerrard and Del Rosso attempted to fraudulently influence the U.S. District Court by anonymously mailing selected documents obtained by hacking Azima for use in litigation against Azima. The anonymous mailing included a recipient list disguising Defendant Gerrard as one of several innocent recipients of the documents, when he was actually their source.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
116.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	4/10/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$250,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
117.	Co-conspirator Page (U.K.)	Co-conspirator Arusy (U.S.)	4/10/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called co-conspirator Arusy to discuss the scheme to defraud Azima.
118.	Defendant Dechert (U.S.)	Azima (U.S.)	4/18/2019	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein emailed Azima's U.S. counsel and falsely claimed that Defendants Dechert and Gerrard were innocent recipients of Azima's anonymously mailed hacked documents from April 2, 2019. Dechert's statements furthered Gerrard's efforts to fraudulent influence the D.C. proceedings.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
119.	Defendant Dechert (U.S.)	Defendant Gerrard (UK); Defendant Hughes (UK); Defendant Forlit (UK); Co-conspirator Halabi (UK); Co-conspirator Buchanan (UK)	5/1/2019	Phone call or video conference	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. partner Linda Goldstein remotely attended a meeting of co-conspirators in London meeting to develop the false story on how the Enterprise obtained Azima's documents to conceal Enterprise's hacking of Azima.
120.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/14/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$100,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
121.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	5/14/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$200,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
122.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	6/17/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$280,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
123.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	7/14/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$300,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
124.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	7/15/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
125.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	8/12/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$250,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
126.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	9/4/2019	Email	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co-conspirator Page for a \$250,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
127.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	10/1/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
128.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	10/1/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
129.	Co-conspirator Page (U.K.)	Defendant Gerrard (U.K.)	10/7/2019	Phone call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Gerrard to discuss the scheme to defraud Azima.
130.	Defendant Dechert (U.S.)	Washington Free Beacon (U.S.)	10/17/2019	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's Chairman Andrew Levander, in a letter emailed to the Washington Free Beacon, falsely and categorically denied that Dechert's Client had any involvement in the hacking of Azima. Mr. Levander also falsely denied Handjani's involvement in the hacking of Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
131.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	10/28/2019	Email	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co- conspirator Page for a \$255,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
132.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	11/29/2019	Email	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co- conspirator Page for a \$273,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
133.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	12/31/2019	Email	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co- conspirator Page for a \$232,500 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.

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134.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/9/2020	Email	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co- conspirator Page for a \$143,500 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
135.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	1/10/2020	Email	Communications between co- conspirators in furtherance of scheme to defraud Azima.	Defendant Forlit invoiced co- conspirator Page for a \$100,000 payment while concealing that the payment was for hacking, sham litigation, coverup, and related services in furtherance of scheme to defraud Azima.
136.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	2/4/2020	Email	Communications between co- conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
137.	Defendant Forlit (Israel)	Co-conspirator Page (U.K.)	2/11/2020	Email	Communications between co-conspirators and hacking in furtherance of scheme to defraud Azima.	Co-conspirator Page receives a hacking report containing stolen documents, confidential information, and/or privileged communications transmitted by Defendant Forlit and downloaded by Page from a shared email account used exclusively by Page and Forlit to clandestinely transmit hacking reports.
138.	Defendant Handjani (U.S.)	Co-conspirator Page (U.K.)	Between 3/1/2020 – 3/31/2020	Phone Call	Communications between co-conspirators in furtherance of scheme to defraud Azima.	Defendant Handjani called co-conspirator Page instructing Page to have no further contact with Defendant Gerrard. By this time, Handjani had become Page's main point of contact for the Enterprise.
139.	Co-conspirator Page (U.K.)	Defendant Handjani (U.S.)	Between 4/1/2020 – 4/28/2020	Messaging Application	Dissemination of hacked data in furtherance of scheme to defraud Azima.	Co-conspirator Page forwarded a hacking report prepared by Defendant Forlit requested by Defendant Handjani, using the Signal encrypted messaging application.

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140.	Co-conspirator Ruler (UAE)	Co-conspirator Page (U.K.)	4/28/2020	Mail	Communications between co-conspirators and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Ruler, through the Investment & Development Office of the Government of RAK, sent co-conspirator Page a letter terminating RAK's engagement with Page to protect and reduce liability to the Enterprise.
141.	Co-conspirator Page (U.K.)	Defendant Handjani (U.S.)	On or around 4/28/2020	Phone Call	Communications between co-conspirators and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Page called Defendant Handjani about Page's termination from his RAK engagement and the Enterprise. Handjani replied that he knew nothing of the termination and would check with the co-conspirator Ruler.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
142.	Defendant Handjani (U.S.)	Co-conspirator Page (U.K.)	On or around 4/28/2020	Phone Call	Communications between co-conspirators and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Handjani called co-conspirator Page to tell him that the termination from the RAK engagement and the Enterprise was temporary, a matter of internal politics, and that Page would be reinstated months later. Page's termination stemmed from dissatisfaction with the court finding Page's testimony not credible in the U.K. Proceedings and to protect the Enterprise.
143.	Co-conspirator Ruler (UAE)	Co-conspirator Page (U.K.)	6/14/2020	Mail	Communications between co-conspirators and prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Ruler, through the Investment & Development Office of the Government of RAK, sent co-conspirator Page a letter confirming termination from the RAK engagement and Enterprise. Page's termination stemmed from dissatisfaction with the court finding Page's testimony not credible in the U.K. Proceedings and to protect the Enterprise.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
144.	Co-conspirator Robinson (U.K.)	Co-conspirator Grayson (U.K.)	7/1/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Robinson called co-conspirator Grayson in a "panic" to say Robinson had been accused of hacking and served with the claim in the Stokoe Proceedings, which threaten to expose the Enterprise's hacking operation directed by Defendant Del Rosso.
145.	Co-conspirator Grayson (U.K.)	Defendant Del Rosso (U.S.)	7/1/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Grayson called Defendant Del Rosso to inform Del Rosso that co-conspirator Robinson had been served in the Stokoe Proceedings, was accused of hacking, and wanted a lawyer. Defendant Del Rosso replies, "Patrick, leave it to me. I'll talk to Paul [Robinson]."
146.	Co-conspirator Neuman (U.S.)	Co-conspirator Grayson (U.K.)	On or around 7/4/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Neuman called co-conspirator Grayson "many" times to discuss the Stokoe Proceedings and accusations that co-conspirator Robinson had hacked Stokoe on behalf of Defendant Del Rosso.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
147.	Defendant Del Rosso (U.S.)	Co-conspirator Grayson (U.K.)	On or around 7/4/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso called co-conspirator Grayson "many" times to discuss the Stokoe Proceedings and accusations that co-conspirator Robinson had hacked Stokoe on behalf of Defendant Del Rosso.
148.	Defendant Del Rosso (U.S.); Co-conspirator Neuman (U.S.)	Co-conspirator Grayson (U.K.)	On or around 7/4/2020	Email	Prevention of RICO Conspirators' exposure and manufacture of false evidence in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Neuman asked co-conspirator Grayson to provide his retainer agreement with Dechert for an unrelated project. Del Rosso and Neuman would then use the retainer to draft a false and retroactive retainer agreement to cloak hacking assignments under Del Rosso's direction with privilege under the guise of instructions from Dechert.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
149.	Co-conspirator Grayson (U.K.)	Defendant Del Rosso (U.S.); Co-conspirator Neuman (U.S.)	On or around 7/4/2020	Email	Prevention of RICO Conspirators' exposure and manufacture of false evidence in furtherance of scheme to defraud Azima.	Co-conspirator Grayson provided his retainer agreement with Dechert for an unrelated project to Del Rosso and Neuman, who would then use the retainer to draft a false and retroactive retainer agreement to cloak hacking assignments under Del Rosso's direction with privilege under the guise of instructions from Dechert.
150.	Defendant Del Rosso (U.S.); Co-conspirator Neuman (U.S.)	Co-conspirator Grayson (U.K.)	On or around 7/4/2020	Email	Prevention of RICO Conspirators' exposure and manufacture of false evidence in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Neuman sent co-conspirator Grayson a fraudulent and retroactive draft retainer agreement, which falsely stated that Grayson's investigations and hacking alleged in the Stokoe Proceedings "were prompted by [Grayson's] engagement and work with Dechert LLP." The draft retainer fraudulently conceals Del Rosso's own role between Dechert and Grayson.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
151.	Co-conspirator Grayson (U.K.)	Defendant Del Rosso (U.S.); Co-conspirator Neuman (U.S.)	On or around 7/4/2020	Email	Prevention of RICO Conspirators' exposure and manufacture of false evidence in furtherance of scheme to defraud Azima.	Co-conspirator Grayson provided edits to the draft false retainer agreement prepared by Defendant Del Rosso and co-conspirator Neuman concealing Del Rosso's role in supervising hacking by Grayson as alleged in the Stokoe Proceedings.
152.	Defendant Del Rosso (U.S.)	Co-conspirator Grayson (U.K.)	On or around 7/4/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso called co-conspirator Grayson to offer an increased monthly retainer and a £500,000 bonus if he agreed to stay silent regarding Del Rosso's role in the hacking and prevent litigation from spreading to the U.S.
153.	Co-conspirator Grayson (U.K.)	Defendant Handjani (U.S.)	On or around 7/4/2020	Phone Call	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Grayson and his intermediary Steve McIntyre called Defendant Handjani about Defendant Del Rosso's offer of a £500,000 bonus and payment of legal fees if Grayson stayed silent about the hacking. During this call, Handjani guaranteed Del Rosso's offer.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
154.	Defendant Handjani (U.S.)	Co-conspirator Grayson (U.K.); Steve McIntyre (U.K.)	On or around 7/4/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Handjani texted co-conspirator Grayson's intermediary Steve McIntyre that the Enterprise will need Defendant Gerrard's approval of payments to Grayson in exchange for concealing Defendant Del Rosso's role in the hacking allegations from the Stokoe Proceedings. Handjani also advises approaching Gerrard in an unaggressive fashion.
155.	Defendant Handjani (U.S.)	Co-conspirator Grayson (U.K.); Steve McIntyre (U.K.)	On or around 7/4/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Handjani texted co-conspirator Grayson's intermediary: "Please assure Patrick [Grayson] that his fees will be fully paid by the client."

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156.	Co-conspirator Neuman (U.S.)	Co-conspirator Grayson (U.K.)	7/17/2020	Email	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Neuman sent co-conspirator Grayson the claim papers served on co-conspirator Robinson in the Stokoe Proceedings to coordinate on how to conceal Defendant Del Rosso's supervision of hacking by Grayson and Robinson.
157.	Defendant Del Rosso (U.S.)	Co-conspirator Jain (India)	8/29/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso messaged and called co-conspirator Jain on the messaging application Threema to accuse Jain of working with Azima's lawyers "to [p]oint finger[s]" at the RICO Conspirators and instruct Jain to stop. Del Rosso then told Jain: "Hope this is not correct. We should talk."

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
158.	Defendant Del Rosso (U.S.)	Co-conspirator Jain (India)	9/11/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso messaged co-conspirator Jain to discuss engaging in further hacking for the purpose of concealing their illegal conduct because Azima's legal team "seem to have information" about the hacking.
159.	Co-conspirator Jain (India)	Defendant Del Rosso (U.S.)	9/12/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Jain discussed the destruction of documents for the purpose of concealing their illegal conduct.
160.	Defendant Del Rosso (U.S.)	Co-conspirator Jain (India)	11/6/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Jain discussed creating a fake contract for the purpose of concealing their illegal conduct.

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161.	Defendant Del Rosso (U.S.)	Co-conspirator Jain (India)	11/8/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Jain again discussed creating a fake contract and fake reports for the purpose of concealing their illegal conduct.
162.	Co-conspirator Jain (India)	Defendant Del Rosso (U.S.)	11/9/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Del Rosso and co-conspirator Jain again discussed creating a fake contract and fake reports for the purpose of concealing their illegal conduct.
163.	Defendant Del Rosso (U.S.); Defendant Vital Management Services (U.S.)	U.S. District Court for the Middle District of North Carolina	11/12/2020	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendants Del Rosso and Vital Management Services falsely and "categorically den[ied]" Azima's allegations that they had overseen and directed Azima's hacking.

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164.	Co-conspirator Jain (India)	Defendant Del Rosso (U.S.)	11/18/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Jain sent Defendant Del Rosso the fake contract to conceal their illegal conduct. The final contract was backdated to May 7, 2019.
165.	Co-conspirator Grayson (U.K.)	Co-conspirator Jain (India)	11/20/2020	Messaging Application	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Co-conspirator Grayson messages co-conspirator Jain to "investigate" and confirm Defendant Del Rosso's suspicions that co-conspirator Page is exposing Del Rosso's role within the Enterprise.
166.	Defendant Del Rosso (U.S.); Defendant Vital Management Services (U.S.)	U.S. District Court for the Middle District of North Carolina	3/5/2021	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendants Del Rosso and Vital Management Services falsely claimed that their payments to co-conspirator CyberRoot were not for hacking Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
167.	Defendant Handjani (U.S.)	U.S. District Court for the Southern District of New York	7/28/2021	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	In an opposition filing, Defendant Handjani falsely stated that "he had no knowledge of or involvement in any hacking of Azima," and that he "had no knowledge of Azima's material being hacked, who hacked it, or of it appearing online."
168.	Defendant Del Rosso (U.S.)	U.S. District Court for the Middle District of North Carolina	11/30/2021	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendants Del Rosso falsely denied involvement in hacking Azima, stating that he "stands by his sworn statement that he had no involvement in the alleged hacking" of Azima.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
169.	Defendant Forlit (Israel)	U.S. District Court for the Southern District of Florida	3/16/2022	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Forlit filed an affidavit falsely claiming that his co-conspirator company SDC-Gadot LLC has never conducted business in the state of Florida.
170.	Defendant Forlit (Israel)	U.S. District Court for the Southern District of Florida	5/12/2022	Electronic Case Filing and Service	Prevention of RICO Conspirators' exposure in furtherance of scheme to defraud Azima.	Defendant Forlit filed another affidavit that falsely stated his co-conspirator company SDC-Gadot LLC "has not conducted business in the State of Florida" and "has not conducted any business in years."
171.	Defendant Forlit (Israel)	U.S. District Court for the Southern District of Florida	6/01/2022	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Forlit filed another affidavit falsely stating: (1) "I am not a hacker . . . and [hacking] is not something that I ever performed."; and (2) that he found Azima's hacked documents on the internet.

	<u>Communication From</u>	<u>Communication To</u>	<u>Date</u>	<u>Format</u>	<u>Purpose(s)</u>	<u>Description</u>
172.	Defendant Dechert (U.S.)	Azima (U.S.)	6/14/2022	Email	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendant Dechert's U.S. General Counsel Rosenberg emailed Azima's U.S. counsel falsely denied that Dechert's filings and representations to the Court were inaccurate and reiterated the false story that Azima's hacked materials were "publicly available on the internet."
173.	Defendant Del Rosso (U.S.); Defendant Vital Management Services (U.S.)	U.S. District Court for the Middle District of North Carolina	10/12/2022	Electronic Case Filing and Service	Promotion of false story that co-conspirators discovered Azima's hacked documents online in furtherance of scheme to defraud Azima.	Defendants Del Rosso and Vital Management Services falsely claimed that their payments to co-conspirator CyberRoot were not for hacking Azima and falsely denied involvement in hacking Azima.